

Exhibit B

Declaration of Sidney Hemphill

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CONCERNED PASTORS FOR
SOCIAL ACTION, et al.,

Plaintiffs,

v.

Case No. 16-10277

Hon. David M. Lawson

NICK A. KHOURI, et al.,

Defendants.

SIDNEY D HEMPHILL

DECLARATION OF SIDNEY HEMPHILL

I, Sidney Hemphill, do hereby affirm and state:

1. I have lived in Flint, Michigan for sixty years. For the last eleven years, I have lived in the same house.
2. In the fall of 2019, the City dug up my galvanized steel service line and replaced it with a copper service line. Shortly after the City first replaced my service line, the new service line started leaking and flooded my front yard. After I called the City to tell them about the leak, the City returned to dig up my service line a second time and fix the leak.
3. The City's service line replacement work damaged my lawn and sidewalk. Since the City replaced my service line over three years ago, the City has

never returned to my house to repair the damage caused by its work. I have never received any contact from the City about repairing my property.

4. To identify the material of my service line and replace it, the City dug a large hole in my front yard. When the City finished the service line replacement, it refilled this hole with the dirt it had dug out. The City did not add any additional topsoil. The City also did not place any seeds or sod on the dirt.

5. The City's damage to my lawn has continued to be a problem. In the three years since the City replaced my service line and damaged my lawn, I have attempted to plant grass in the area the City dug up. This hasn't worked, and my front lawn looks like it has a bald spot. My backyard, where the City did not do any work, has beautiful green grass—it could be a golf course.

6. I am frustrated that the City never came back to repair the damage they caused, and I would like the City to fix my front lawn. I don't want the first thing people see when they come to my house to be a dead front yard.

7. When the City dug up my service line, it also removed a four-foot length of sidewalk in front of my house, leaving only dirt and gravel in place of paving. The piece of sidewalk has been missing ever since.

8. The dirt and gravel the City left in place of the missing sidewalk are not level with the sidewalk, and I'm concerned that someone could trip and hurt themselves. The missing patch of sidewalk also forces bikers to leave the sidewalk

and bike in the street, which is dangerous. When it rains, the rain washes away the dirt, making the dirt patch even less level with the sidewalk. To make the missing sidewalk safer for walkers and bikers, I buy bags of small rocks that I use to try to even out the area. I have had to replace the small rocks to fill in the missing sidewalk multiple times in the past three years.

9. I would like the City to come back and fix my sidewalk. The City messed it up, and they should fix it.

10. I understand that the City may visually inspect my property to determine whether the City will restore my property in the future. If the City inspects my property and decides that it will not be coming back to restore my property, I'd want to be notified. This notification would allow me to contact the City and explain that there is still restoration work to be done at my home. It would also help me decide whether to repair my sidewalk and lawn myself.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 19, 2023

A handwritten signature in cursive script, appearing to read "Sidney D. Hemphill", written over a horizontal line.

Sidney Hemphill